## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: Chapter 11 WELDED CONSTRUCTION, L.P., Case No. 18-12378 (CSS) (Jointly Administered) Debtor, SUNBELT EQUIPMENT MARKETING, INC., Adv. Pro. No. 20-50445 (CSS) Plaintiff, Adv. Pro. No. 20-50447 (CSS) v. (consolidated) COLUMBIA GAS TRANSMISSION, LLC, TRANSCANADA USA SERVICES INC, and WELDED CONSTRUCTION LP. Defendants. SUNBELT TRACTOR & EQUIPMENT COMPANY, INC., Adv. Pro. No. 20-50446 (CSS) Plaintiff. Adv. Pro. No. 20-50448 (CSS) v. (consolidated) COLUMBIA GAS TRANSMISSION, LLC, TRANSCANADA USA SERVICES INC, and WELDED CONSTRUCTION LP. Defendants.

### STATUS REPORT FOR CERTAIN ADVERSARY PROCEEDINGS

Sunbelt Equipment Marketing, Inc., and Sunbelt Tractor & Equipment Company, Inc., as Plaintiffs in the above-captioned adversary proceedings, hereby submit this status report, pursuant to the respective scheduling orders, as to the two above-captioned adversary proceedings, in both of which Columbia Gas Transmission, LLC, TransCanada USA Services Inc, are active defendants and debtor, Welded Construction, L.P., is a nominal defendant. The status of these two actions is set forth in the Exhibit that follows.

Dated: March 1, 2021

### /s/ Douglas N. Candeub

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Counsel for Sunbelt Equipment Marketing, Inc. and Sunbelt Tractor & Equipment Company, Inc.

# $\underline{\textbf{EXHIBIT 1}}$ List of Defendants and Adversary Proceedings addressed in this Status Report

Plaintiff	Defendants	Adv. Proc. No.
Sunbelt Equipment Marketing, Inc.	Columbia Gas Transmission, LLC, TransCanada USA Services Inc and Welded Construction, L.P.	Adv. Pro. No. 20-50445 (CSS) Adv. Pro. No. 20-50447 (Consolidated)
Sunbelt Tractor & Equipment Company, Inc.		Adv. Pro. No. 20-50446 (CSS) Adv. Pro. No. 20-50448 (Consolidated)

**STATUS CATEGORY A:** List all cases where service is not complete.

None.

STATUS CATEGORY B: List all cases where service is complete but answer still due.

None.

**STATUS CATEGORY C:** List all cases where no answer has been filed, and are making motion or request for Default Judgment.

None.

STATUS CATEGORY D: List all cases that have been settled or dismissed.

Not applicable.

**STATUS CATEGORY E:** List all cases that have been settled or resolved, but a notice or stipulation of dismissal cannot yet be filed.

Not applicable.

**STATUS CATEGORY F:** List all cases where service is complete, answer has been filed, discovery/disclosures are underway, and expected date of completion of discovery/disclosure.

Adv. Pro. Nos.	<u>Plaintiff</u>	<u>Defendants</u>	<u>Comments</u>
1. 20-50445 (consolidated with 20-50447)	Sunbelt Equipment Marketing, Inc.	Columbia Gas Transmission, LLC, TransCanada USA Services Inc., and Welded Construction, L.P.	A Scheduling Order was entered on May 5, 2020.  The discovery planning conference described in Fed.R.Civ.P. 26(f) took place on May 26, 2020. Initial disclosures were timely made thereafter.  Pursuant to the original Scheduling Order, fact discovery was to be completed by 180 days after the discovery planning conference, or Nov. 22, 2020.  On Nov. 16, 2020, the Court entered an Order approving a Stipulation among the parties to Extend Pretrial Deadlines. It extended the fact discovery deadline, and other subsequent deadlines, by 60 days (i.e., to Jan. 21, 2021).  On Jan. 15, 2021, the Court entered an Order approving a second Stipulation among the parties to further Extend Pretrial Deadlines. It extended the fact discovery deadline, and other subsequent deadlines, by an additional 60 days (i.e., to March 22, 2021).  Discovery is ongoing; depositions are being scheduled.  Plaintiff will file its next status report on or about April 16, 2021.

Adv. Pro. Nos.	<u>Plaintiff</u>	<u>Defendants</u>	<u>Comments</u>
2. 20-50446 (consolidated with 20-50448)	Sunbelt Tractor & Equipment Company, Inc.	Columbia Gas Transmission, LLC, TransCanada USA Services Inc., and Welded Construction, L.P.	A Scheduling Order was entered on May 5, 2020.  The discovery planning conference described in Fed.R.Civ.P. 26(f) took place on May 26, 2020. Initial disclosures were timely made thereafter.  Pursuant to the original Scheduling Order, fact discovery was to be completed by 180 days after the discovery planning conference, or Nov. 22, 2020.  On Nov. 16, 2020, the Court entered an Order approving a Stipulation among the parties to Extend Pretrial Deadlines. It extended the fact discovery deadline, and other subsequent deadlines, by 60 days (i.e., to Jan. 21, 2021).  On Jan. 15, 2021, the Court entered an Order approving a second Stipulation among the parties to further Extend Pretrial Deadlines. It extended the fact discovery deadline, and other subsequent deadlines, by an additional 60 days (i.e., to March 22, 2021).  Discovery is ongoing; depositions are being scheduled.  Plaintiff will file its next status report on or about April 16, 2021.

STATUS CATEGORY G: List all cases where a Mediator has been selected or appointed.

Adv. Pro. Nos.	<u>Plaintiff</u>	<u>Defendants</u>	<u>Comments</u>
20-50445 (consolidated with 20-50447)	Sunbelt Equipment Marketing, Inc.	Columbia Gas Transmission, LLC, TransCanada USA Services Inc and Welded Construction, L.P.	On Nov. 5, 2020, an Order was entered Assigning Adversary Proceeding to Mediation and Appointing. Raymond H. Lemisch as the Mediator.  On February 16, 2021, the Mediator filed a Mediation Status Report which stated:
			"After separate mediation sessions with each of Plaintiffs and Defendant, a joint mediation session was held with the parties on December 11, 2020. The parties continue utilizing the mediation process to try to reach a resolution."
20-50446 (consolidated with 20-50448)	Sunbelt Tractor & Equipment Company, Inc.	Columbia Gas Transmission, LLC, TransCanada USA Services Inc., and Welded Construction, L.P.	On Nov. 5, 2020, an Order was entered Assigning Adversary Proceeding to Mediation and Appointing. Raymond H. Lemisch as the Mediator.  On February 16, 2021, the Mediator filed a Mediation Status Report which stated:  "After separate mediation sessions with each of Plaintiffs and Defendant, a joint mediation session was held with the parties on December 11, 2020. The parties continue utilizing the mediation process to try to reach a resolution."

**STATUS CATEGORY H:** List all cases that are ready for trial.

None.

**STATUS CATEGORY I:** List all cases that have a dispositive Motion pending on at least one Count.

None.

**STATUS CATEGORY J:** List all cases that have been stayed by Defendant Welded's bankruptcy.

None.

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